Kameron Sam
District Ranger
Barlow Ranger District
780 Court Street, Dufur, OR 97021

October 1, 2020

RE: South Pen Insect and Disease Project

Dear District Ranger Kameron Sam,

The members of the Wasco County Forest Collaborative respectfully submit this letter in response to the Mount Hood National Forest's request for input on the South Pen Insect and Disease Project. Collaborative members and partners appreciate the opportunity to provide input and engage with your staff prior to the formal scoping period. This "pre-NEPA" engagement is a helpful opportunity to develop a shared understanding of the project and identify areas of collaborative agreement and topics for on-going dialogue.

Collaborative Membership

The Wasco County Forest Collaborative includes eleven voting members appointed by the Wasco County Board of Commissioners. The following individuals were appointed by the Wasco County Board of Commissioners to represent diverse interests at the collaborative table:
Tribal – Bob Sjolund, Warm Springs Tribe
Community Wildfire Protection – Kristin Dodd, Oregon Department of Forestry
State Agency – Jeremy Thompson, Oregon Department of Fish and Wildlife
Private Landowner – Larry Magill, Wamic
Water Resources – Pat Davis, White River Watershed Council
Recreation and Tourism – Kathy Long, OMAC
Local Government – Ryan Bessette, Wasco County Soil and Water Conservation District
Environmental – Brenna Bell, Bark
Forest Products – Jeremy Grose, SDS Lumber Co.
At-Large – Rich Thurman, Retired Wildlife Biologist
At-Large – John Nelson, School District 21 Board Member

Collaborative Engagement

In June 2019 the Forest Service notified the Wasco County Forest Collaborative that the agency planned to utilize the Insect and Disease Categorical Exclusion authority on two projects on the Barlow Ranger District: Pollywog and South Pen. The collaborative worked with your staff to organize a field trip to the Pollywog and South Pen Insect and Disease projects in August 2019. One of the field tour stops was located within the South Pen Insect and Disease Project area. In November 2019 the collaborative received a presentation from Forest Service entomologist, Beth Willhite, who answered a number of questions identified by the collaborative. The agency

scoped the Pollywog Project in February 2020 and the collaborative submitted a letter to the Forest Service in March 2020. The recommendations in this letter build on and reiterate collaborative member interests, agreements, and concerns as identified in the Pollywog Insect and Disease Project as well as the Rocky Restoration Project.

Collaborative Process Considerations

Health Forest Restoration Act (HFRA) provides guidance regarding use of the Insect and Disease Categorical Exclusions. A specific requirement in HFRA guidance states that projects "be developed and implemented through a collaborative process that includes multiple interested persons representing diverse interests and is transparent and non-exclusive."

Given that the authority being used to plan the South Pen Insect and Disease Project requires collaboration, Wasco County Forest Collaborative members expect to be highly engaged throughout project design and implementation.

The Wasco County Forest Collaborative operates on consensus, per our charter and operating principles. The collaborative would like to emphasize that the Forest Service's interest in identifying and designing projects that support the group achieving our mission and operating principles is greatly appreciated and contributes to successful relationship and trust building over time. All members of the collaborative are committed to working with the Forest Service to build consensus agreements and be transparent about our interests and concerns.

As part of the ongoing development of the South Pen Insect and Disease Project, collaborative members respectfully request the following process considerations:

- Regular updates regarding the status of the project provided at the monthly Wasco County Forest Collaborative meetings as well as focused follow-up discussions on the topics of interests identified in this letter.
- Once the Forest Service has made a decision, schedule a project briefing to provide the collaborative with an overview of the Forest Service's decision and an opportunity to discuss how collaborative input was integrated into the project.
- Information about how the Forest Service plans to engage the collaborative through implementation and monitoring.

While collaborative members appreciate the interest in finding efficiencies and accelerating the planning and implementation of vegetation management projects through the use of Categorical Exclusions, this new approach also creates process concerns due to shorter timelines and the limited amount of information available to the public relative to Environmental Assessments and Environmental Impact Statements. Fostering transparency and open communication throughout this project in order to better address these process-related concerns will be critical to ensuring continued shared learning and consensus building. This is especially important given that we are unable to conduct regular field trips and interact face-to-face as a result of the COVID-19 pandemic. The collaborative appreciates the Forest Service's

efforts to work with the collaborative and our partners to find new and effective venues for public engagement and on-going dialogue. Potential new approaches to our engagement include virtual and/or self-guided field tours, sharing and presentation of project information and data, and opportunities for small group/sub-committee meetings with Forest Service specialists as needed.

South Pen Insect and Disease Project Resource Objectives

The South Pen Insect and Disease Project is an opportunity to achieve multiple resource objectives related to the overarching goals of the Wasco County Forest Collaborative, including:

- reduced risk of drought-related mortality and insect and disease outbreaks,
- improved wildlife habitat conditions,
- reduced risk of wildfire spreading to adjacent private landowners and nearby communities, and
- production of restoration by-products for local wood products businesses and employing local workers.

These resource objectives encompass many of the overarching objectives of the Wasco County Forest Collaborative and there is support for these objectives as part of the South Pen Insect and Disease Project.

Vegetation Management

There is collaborative agreement to conduct active management and thinning activities in plantations to reduce densities, increase species diversity and heterogeneity (favoring drought- and fire-tolerant species), reduce risk of future insect and disease outbreaks, and improve wildlife habitat.

Outside of plantations and previously managed areas within South Pen Insect and Disease Project the forest has been impacted by fire suppression and climate change, often resulting in more dense stand conditions susceptible to drought-related mortality, insects and disease outbreaks, and large patches of high-severity wildfire. There is collaborative support for active management and thinning outside of plantations in South Pen under the following conditions:

- Healthy Forest Restoration Act (HFRA) requires that projects utilizing the Insect and Disease Authority protect large trees. Project design criteria are included that ensure protection of large trees, specifically addressing the need to protect drought-tolerant species such as Oregon White Oak and ponderosa pine, provide complex structure important to wildlife, and support resistance and resilience in the face of future drought, insect and disease outbreaks, and wildfire.

Collaborative members recognize that mechanical fuels treatments will be required before the Forest Service introduces prescribed fire to the South Pen area. Collaborative members support

implementation of prescribed burns in the planning area and would like to work with the Forest Service to conduct outreach and education with local communities and landowners. Prescribed fire is important to collaborative members, specifically as it relates to restoring habitat, reducing risk of large patches of high severity wildfire in pine-oak habitat and dry mixed-conifer forest types, thus protecting water quality and future forest management opportunities.

Wildlife Habitat Considerations

Dry pine-oak and dry mixed conifer forest restoration treatments in the South Pen project are likely to benefit key indicator species such as deer and elk, western grey squirrel, and Lewis' woodpecker. The arrangement of treatments within the planning area should consider the pattern of current and desired landscape conditions in order to ensure adequate cover for species such as elk. This could be achieved through placement of skips and gaps and consideration of topography, existing riparian buffers, and logging systems.

Collaborative members are interested in understanding how habitat for threatened and endangered species may be positively or negatively impacted as a result of the project. For example, how different management actions may influence habitat, or how treatments may influence the potential for low-, mixed-, or high severity wildfire in the planning area. The collaborative would appreciate the opportunity to learn more about these trade-offs within the project area and to discuss any other T&E species considerations within the project with the Forest Service.

Project design criteria from recent Forest Service projects, if integrated into South Pen, will be useful in addressing collaborative member interests related to wildlife habitat (e.g. snags, down wood, etc.). Specific examples include:

"Snags would be retained in all units where safety permits. If snags must be cut for safety reasons, they would be left on site. To increase the likelihood that snags would be retained, they may be included in skips."

"Certain live trees would also be selected as leave trees that have the "elements of wood decay" as described in the DecAID advisor. This may include trees with features such as dead tops, broken tops and heart rot. They may be retained in skips."

"Old down logs currently on the forest floor would not be removed."

"Additional down woody debris would be generated by operations. This would include the retention of cull logs, tree tops, broken logs and any snags that would be felled for safety reasons."

"Some units have standing trees that were girdled or topped in the past. These would be protected where feasible."

Temporary Roads

Temporary roads have been an on-going discussion on the east zone of the Mount Hood National Forest. The collaborative understands that the Forest Service is seeking efficiencies in the NEPA process and plans to streamline South Pen Insect and Disease Project by utilizing a conditions-based approach for temporary roads. The conditions-based approach will outline project design criteria (PDCs) to describe the conditions under which temporary roads may be placed within the planning area, similar to the process the agency used in Pollywog. The PDCs utilized in the Pollywog Insect and Disease Project address numerous collaborative interests related to soils, hydrology, and other resource values.

There is not consensus support for a conditions-based approach to temporary roads. Collaborative member interests and concerns are summarized here:

- Support conditions-based approach: members of the collaborative appreciate the agency's desire to find efficiencies in the process and support the process that Forest Service sale administrator and purchaser utilize to identify final temporary road alignments based on the guidance provided in the project design criteria.

- No-support for conditions-based approach: there are concerns among members of the collaborative that the conditions-based approach does not adequately identify site-specific measures to ensure that there are not adverse impacts. Concerns include disturbance to wildlife and the adequacy of closure measures. There are also process concerns that the lack of information about temporary roads is not transparent and reduces opportunities for public input.

The collaborative respectfully requests the opportunity for additional dialogue and information sharing that will be helpful as we work together to build consensus agreements.

Role of Native Insects and Diseases

Forest collaborative members appreciate that the Forest Service is working to implement active management in the areas most affected by insect and disease outbreaks, and at the same time not trying to eliminate all insects and diseases from the landscape. The insects and diseases currently present in South Pen are native to the Pacific Northwest. They play an important role in creating heterogeneity across the landscape and often produce high quality wildlife habitat.

The increased presence of insects and diseases is a natural response to a century of fire suppression, past management activity and overstocking, and drought. All known insect and disease agents can be heavily influenced by damage to live trees and roots. The collaborative respectfully requests project design criteria that addresses the potential for machinery-caused damage to live trees, roots, and soils.

Pine engraver beetles, like Ips beetles, are drawn into stands containing fresh slash and then proceed to feed on small pines once the slash has been consumed. For this reason, we support a PDC that focuses on timely slash treatment – less than two years after creation.

Community Engagement

The project area is within the Pine Hollow Wildland Urban Interface (WUI) and White River WUI, and immediately adjacent to ODFW and private lands. These are priority areas identified in the Wasco County Community Wildfire Protection Plan (CWPP) and the Central Wasco County All-Lands Joint Chiefs Project. In many ways, the South Pen Insect and Disease Project has the potential to build on the success of the Rocky Restoration Project. As part of the implementation plan, the Wasco County Forest Collaborative would like to work with the Mount Hood National Forest to host a virtual "town hall" or another type of community-oriented event to share information with the public about the outcomes of collaborative projects and our shared interests in all-hands, all-lands forest restoration and sustainable natural resource management.

The White River Fire is an important reminder of the important role of pre-fire planning and implementation of forest restoration and fuels treatments that have the potential to influence wildfire behavior, reduce the potential loss of values at risk, and aid in the protection of communities, infrastructure, and homes. Members of the collaborative appreciate the Forest Service's interest in working together to collaborate on these important topics through the South Pen Insect and Disease Project.

Thank you for the opportunity to provide input to the Mount Hood National Forest. We appreciate your consideration of collaborative interests and look forward to working with your team throughout the project.

Sincerely,

Andrew Spaeth
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